



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Watershed Protection Branch

2 Martin Luther King, Jr. Drive
Suite 1152, East Tower
Atlanta, Georgia 30334
404-463-1511

Persons who commented on
Draft NPDES Permit No. GA0037222

Sep 21, 2020

RE: EPD Response to Comments
City of Albany
Joshua Street Water Pollution Control Plant (WPCP)
NPDES Permit No. GA0037222

Dear Sir/Madam:

Thank you for your comments regarding the permit reissuance for the City of Albany's Joshua Street WPCP. Attached is a summary of comments from the public and EPD's responses to the issues raised. We appreciate your interest in this matter.

After consideration of your comments, EPD has determined that the permit is protective of water quality standards and we have issued the permit.

If you have any questions or concerns, please contact Kelli-Ann Sottile at 404-463-4945 or via email at kelli-ann.sottile@dnr.ga.gov.

Sincerely,

Audra Dickson, Manager
Wastewater Regulatory Program
Watershed Protection Branch

AD/kas

Attachments: Response to Comments, Permit, Fact Sheet

Response to Comments
City of Albany – Joshua Street Water Pollution Control Plant (WPCP)
NPDES Permit No. GA0037222
Dougherty County

Comment	EPD Response
Given the exceedances of the requirements and limits of the Clean Water Act due to the CSO discharges (just a handful of miles upstream of the Joshua Street Plant), we note the very high likelihood that the requirements of the permit for the Plant are likely not protective of the receiving waters during moderate to major CSO discharge events. Thus, the [instream] monitoring requirements [at the following locations: a. The boat ramp below Albany dam; b. The lower kayak launch downtown; c. Oakridge Drive bridge (GA 234); d. Midstream ¼ mile downstream of the Joshua Street facility; and e. “Punks” landing boat ramp (just inside Mitchell County, on the east bank)] [...] should also be included in the permit (especially ¼ mile below the Joshua Street outfall and at “Punk’s” Landing) in order to maintain a full picture of what is actually happening in the river. This set of requirements will be an extremely important feature not only of the CSO permit but also of the Joshua Street permit, and thus we insist upon such inclusion.	Instream monitoring at three locations in the Flint River, including two upstream and one downstream of the Joshua Street Water Pollution Control Plant (WPCP) outfall, has been included in the City of Albany’s Combined Sewer Overflow (CSO) permit (NPDES Permit No. GA0036854). Since instream monitoring upstream and downstream of the Joshua Street WPCP would be identical to that provided for the CSO, instream monitoring requirements under this permit may not offer any additional information on the quality of the receiving water and is considered duplicative. Additionally, please note that potential water quality violations as a result of the CSO are outside the scope of this permit. Therefore, no changes have been made to the permit.